

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOC # 62

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and
others similarly situated,

Plaintiffs,

-vs.-

BANK OF AMERICA CORPORATION, BARCLAYS
BANK PLC, CITIBANK NA, DEUTSCHE BANK AG,
HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLAB AG,

Defendants.

Case No. 1:11-md-02262-NRB

Hon. Naomi Reice Buchwald

ECF Case

2011.11.17 PM 3:10
S.D. N.Y.

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Richard A. Mescon, a member in good standing of the Bar of this Court, hereby move for Orders allowing the admissions *pro hac vice* of Stacey P. Slaughter and K. Craig Wildfang as counsel for the City of New Britain Firefighters' and Police Benefit Fund, in the above captioned action.

Applicant's Name: Stacey P. Slaughter
Firm Name: Robins, Kaplan, Miller & Ciresi L.L.P.
Address: 800 LaSalle Avenue, Suite 2800
City/State/Zip: Minneapolis, Minnesota 55402
Phone Number: (612) 349-8289
Facsimile Number: (612) 339-4181
Email: spslaughter@rkmc.com


and

Applicant's Name: K. Craig Wildfang
Firm Name: Robins, Kaplan, Miller & Ciresi L.L.P.
Address: 800 LaSalle Avenue, Suite 2800
City/State/Zip: Minneapolis, Minnesota 55402
Phone Number: (612) 349-8554
Facsimile Number: (612) 339-4181
Email: kcwildfang@rkmc.com

Stacey P. Slaughter and K. Craig Wildfang are members in good standing of the Bar of the State of Minnesota. There are no pending disciplinary proceedings against either Stacey P. Slaughter or K. Craig Wildfang in any State or Federal Court.

Dated: November 17, 2011

Respectfully submitted,

By: 

Richard A. Mescon

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue
34th Floor
New York, NY 10022-1240
Tel: 212-980-7400

*Attorneys for City of New Britain Firefighters' and
Police Benefit Fund*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and all
others similarly situated,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION, BARCLAYS
BANK PLC, CITIBANK NA, DEUTSCHE BNK AG,
HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLB AG,
Defendants,

Case No. 1:11-mf-02262-NRB

HON. Naomi Reice Buchwald

ECF Case

**DECLARATION OF RICHARD A. MESCON IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Richard A. Mescon declares and states pursuant to 28 U.S.C. § 1746 as follows:

1. I am a duly licensed attorney admitted to practice in the State of New York and the United States District Court for the Southern District of New York. I am a member in good standing of the Bar of the State of New York and I am in good standing with this Court.

2. I am a member of the Business Litigation Group of the firm of Robins, Kaplan, Miller & Ciresi L.L.P., attorneys for City of New Britain Firefighters' and Police Benefit Fund, in the above captioned action. I am familiar with the proceedings in this case.

3. I make this statement based on my knowledge of the facts set forth herein and in support of the Motion to admit Stacey P. Slaughter and K. Craig Wildfang as counsel *pro hac vice* to represent Plaintiff City of New Britain Firefighters' and Police Benefit Fund in this matter.

4. Stacey P. Slaughter and K. Craig Wildfang are partners of the law firm Robins, Kaplan, Miller & Ciresi L.L.P.

5. I have known and worked with Mrs. Slaughter and Mr. Wildfang since I joined Robins, Kaplan, Miller & Ciresi L.L.P. in May 2011 and I am familiar with their practices.

6. Mrs. Slaughter and Mr. Wildfang are skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Civil Procedure.

7. As evidenced by the Certificate of Good Standing annexed to Mrs. Slaughter's Affidavit (attached hereto as Exhibit A), Mrs. Slaughter has been an active member in good standing of the Bar of the State of Minnesota since October 29, 1999 and the Bar of the State of New York since June 21, 2011.

8. As evidenced by the Certificate of Good Standing annexed to Mr. Wildfang's Affidavit (attached hereto as Exhibit B), Mr. Wildfang has been an active member in good standing of the Bar of the State of Minnesota since October 31, 1977.

9. Accordingly, I am pleased to move for the admissions of Stacey P. Slaughter and K. Craig Wildfang's, *pro hac vice*.

10. I respectfully submit a proposed order granting the admission of Stacey P. Slaughter, *pro hac vice*, which is attached as Exhibit C, and a proposed order granting the admission of K. Craig Wildfang, *pro hac vice*, as Exhibit D.

WHEREFORE, it is respectfully requested that the motion to admit Stacey P. Slaughter and K. Craig Wildfang, *pro hac vice*, to represent City of New Britain Firefighters' and Police Benefit Fund in the above captioned matter, be granted.

Dated: November 17, 2011

Respectfully submitted,

By: 
Richard A. Mescon

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue
34th Floor
New York, NY 10022-1240
Tel: 212-980-7400

*Attorneys for City of New Britain Firefighters' and
Police Benefit Fund*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and
others similarly situated,

Plaintiffs,

-vs.-

BANK OF AMERICA CORPORATION, BARCLAYS
BANK PLC, CITIBANK NA, DEUTSCHE BANK AG,
HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLAB AG,

Defendants.

Case No. 1:11-MD-02262-NRB

Hon. Naomi Reice Buchwald

ECF Case

DECLARATION OF STACEY P. SLAUGHTER

Stacey P. Slaughter declares and states pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney from the law office Robins, Kaplan, Miller & Ciresi L.L.P.
2. I submit this Declaration in support of my admission *pro hac vice* to appear as counsel for City of New Britain Firefighters' and Police Benefit Fund.
3. As evidenced by the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of Minnesota and the Bar of the State of New York.
4. There are no pending disciplinary proceedings against me in any State or Federal court.

WHEREFORE, I respectfully request that I be permitted to appear as counsel *pro hac vice* in this matter.

Dated: November 16, 2011

Respectfully submitted,

By: Stacey P. Slaughter
Stacey P. Slaughter

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue
34th Floor
New York, NY 10022-1240
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800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402-2015
Tel: 612-349-8500

*Attorneys for City of New Britain Firefighters' and
Police Benefit Fund*

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

STACEY PAIGE SLAUGHTER

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

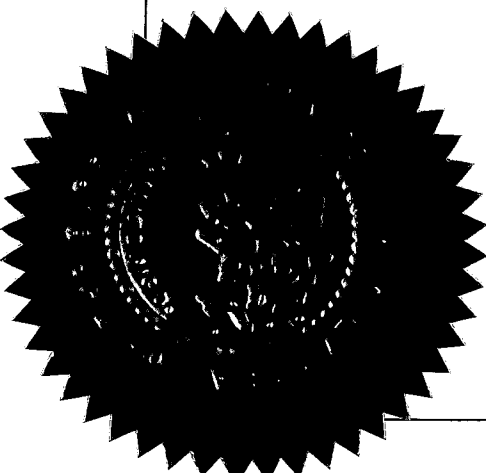
October 29, 1999

Given under my hand and seal of this court on

November 16, 2011



Bridget C. Gernander
Clerk of Appellate Courts





State of New York
Supreme Court, Appellate Division
Third Judicial Department

*I, Robert D. Mayberger, Clerk of the Appellate Division of the
Supreme Court of the State of New York, Third Judicial Department, do
hereby certify that*

Stacey Paige Slaughter

*having taken and subscribed the Constitutional Oath of Office as prescribed by
law, was duly licensed and admitted to practice by this Court as an Attorney
and Counselor at Law in all courts of the State of New York on the 21st day of
June, 2011, is currently in good standing and is registered with the
Administrative Office of the Courts as required by section four hundred sixty-
eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand
and affixed the Seal of said Court, at the
City of Albany, this 10th day of
November, 2011.*



Robert D Mayberger
Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and
others similarly situated,

Plaintiffs,

-vs.-

BANK OF AMERICA CORPORATION, BARCLAYS
BANK PLC, CITIBANK NA, DEUTSCHE BANK AG,
HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLAB AG,

Defendants.

Case No. 1:11-MD-02262-NRB

Hon. Naomi Reice Buchwald

ECF Case

DECLARATION OF K. CRAIG WILDFANG

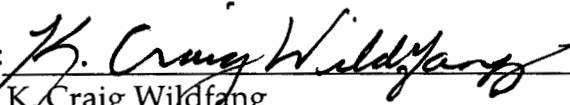
K. Craig Wildfang declares and states pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney from the law office Robins, Kaplan, Miller & Ciresi L.L.P.
2. I submit this Declaration in support of my admission *pro hac vice* to appear as counsel for City of New Britain Firefighters' and Police Benefit Fund.
3. As evidenced by the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of Minnesota
4. There are no pending disciplinary proceedings against me in any State or Federal court.

WHEREFORE, I respectfully request that I be permitted to appear as counsel *pro hac vice* in this matter.

Dated: November 16, 2011

Respectfully submitted,

By: 
K. Craig Wildfang

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue
34th Floor
New York, NY 10022-1240
Tel: 212-980-7400

800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402-2015
Tel: 612-349-8500

*Attorneys for City of New Britain Firefighters' and
Police Benefit Fund*

82626855.1

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

K CRAIG WILDFANG

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

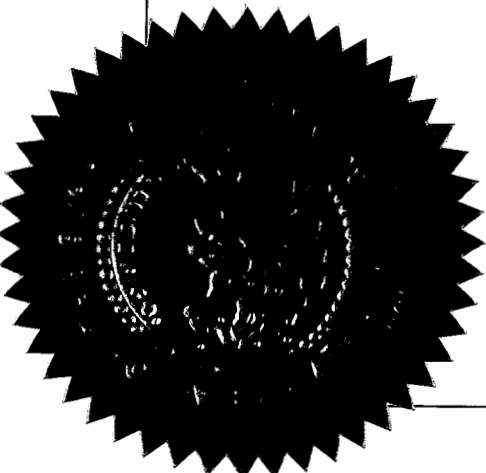
October 21, 1977

Given under my hand and seal of this court on

November 16, 2011



Bridget C. Gernander
Clerk of Appellate Courts



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of CITY OF NEW BRITAIN FIREFIGHTERS' AND POLICE BENEFIT FUND, on behalf of itself and others similarly situated, Plaintiffs, -vs.- BANK OF AMERICA CORPORATION, BARCLAYS BANK PLC, CITIBANK NA, DEUTSCHE BANK AG, HBOS plc, HSBC HOLDINGS PLC, JPMORGAN CHASE & CO., LLOYDS BANKING GROUP PLC, UBS AG, and WESTLAB AG, Defendants.	 Case No. 1:11-md-02262-NRB Hon. Naomi Reice Buchwald ECF Case
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[PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE* ON WRITTEN MOTION

Upon the motion of Richard A. Mescon, said sponsor attorney's declaration in support; IT IS HEREBY ORDERED THAT

Stacey P. Slaughter
Robins, Kaplan, Miller & Ciresi L.L.P.
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
Phone: (612) 349-8500 Fax: (612) 339-4181
Email: spslaughter@rkmc.com

is admitted to practice *pro hac vice* as counsel for Plaintiff City of New Britain

Firefighters' and Police Benefit Fund in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF)

system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

So Ordered: New York, New York
November __, 2011

United States District Judge

82622046.1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and
others similarly situated,

Plaintiffs,

-vs.-

BANK OF AMERICA CORPORATION, BARCLAYS
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HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLAB AG,

Defendants.

Case No. 1:11-md-02262-NRB

Hon. Naomi Reice Buchwald

ECF Case

[PROPOSED] ORDER FOR ADMISSION *PRO HAC VICE* ON WRITTEN MOTION

Upon the motion of Richard A. Mescon, said sponsor attorney's declaration in
support; IT IS HEREBY ORDERED THAT

K. Craig Wildfang
Robins, Kaplan, Miller & Ciresi L.L.P.
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
Phone: (612) 349-8500
Fax: (612) 339-4181
Email: kcwildfang@rkmc.com

is admitted to practice *pro hac vice* as counsel for Plaintiff City of New Britain
Firefighters' and Police Benefit Fund in the above captioned case in the United States
District Court for the Southern District of New York. All attorneys appearing before this

Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

So Ordered: New York, New York
November __, 2011

United States District Judge

82627343.1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the matter of the application of

CITY OF NEW BRITAIN FIREFIGHTERS' AND
POLICE BENEFIT FUND, on behalf of itself and
others similarly situated,

Plaintiffs,

-vs.-

BANK OF AMERICA CORPORATION, BARCLAYS
BANK PLC, CITIBANK NA, DEUTSCHE BANK AG,
HBOS plc, HSBC HOLDINGS PLC, JPMORGAN
CHASE & CO., LLOYDS BANKING GROUP PLC,
UBS AG, and WESTLAB AG,

Defendants.

Case No. 1:11-md-02262-NRB

HON. Naomi Reice Buchwald

ECF Case

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2011, I caused the following documents:

1. Motion to Admit Counsel *Pro Hac Vice*;
2. Declaration of Richard A. Mescon in Support of Motion to Admit Counsel *Pro Hac Vice*;
3. Declaration of Stacey P. Slaughter;
4. Declaration of K. Craig Wildfang;
5. [Proposed] Order for Admission *Pro Hac Vice* on Written Motion (for Stacey P. Slaughter);
6. [Proposed] Order for Admission *Pro Hac Vice* on Written Motion (for K. Craig Wildfang); and
7. Certificate of Service

to be filed with the Clerk of Court by hand delivery, and served by email on the following:

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mark Jacob Altschul**
maltschul@mwe.com
- **Juan Alberto Arteaga**
jarteaga@stblaw.com
- **Steve W. Berman**
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- **Vincent Briganti**
vbriganti@lowey.com
- **Ralph Johnson Bunche , III**
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-
- **Robert Frank Wise , Jr**
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and served by first-class U.S. mail on the following:

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Miller Law LLC
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Chicago, IL 60603
312-332-3400
Fax: (312) 676-2676

Dated: November 17, 2011

Respectfully submitted,

By: 
Richard A. Mescon

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
601 Lexington Avenue
34th Floor
New York, NY 10022-1240
Tel: 212-980-7400

*Attorneys for Plaintiff City of New Britain
Firefighters' and Police Benefit Fund*